

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

IN RE
Miscellaneous Jewelry
(Value \$7,896.00)
23-FBI-005911

Misc. No.: 23-mc-51742

**Stipulation and Order Extending United States' Time to File
Forfeiture Complaint and to Toll the Civil Filing Deadline**

It is hereby stipulated by and between the United States of America, by and through its undersigned attorneys, and claimant Nicole Wilski by and through her attorney, Jihan Williams, and claimant James Rahaim, by and through his attorney, Vincent Haisha, as follows:

1. On June 27, 2023, Federal Bureau of Investigation ("FBI") seized the following property:

- \$7,896.00 in Miscellaneous Jewelry

(referred to herein as the "Property").

2. The Parties acknowledge and stipulate that FBI provided notice as required by 18 U.S.C. § 983(a)(1)(A) of the seizure and its intent to administratively forfeit the Property to all known interested

parties, including to Claimants.

3. Claimant Wilski and Claimant Rahaim each filed a claim in the administrative forfeiture proceeding with FBI regarding the Property. No other person has filed a claim to the Property in the administrative forfeiture proceeding.

4. FBI referred the administrative claim to the United States Attorney's Office for civil judicial forfeiture proceedings.

5. Pursuant to 18 U.S.C. § 983(a)(3)(A) and (B), within 90 days after a claim has been filed in an administrative forfeiture proceeding, the United States is required to do one of the following:

- (a) file a complaint for forfeiture against the claimed property,
- (b) return the claimed property, or
- (c) include the claimed property for forfeiture in a criminal action,

in order for the United States to take further action to effect the civil forfeiture of the claimed property in connection with the underlying offense, unless the court extends the deadline for good cause shown or by agreement of the parties. In this case the Order Extending the

United States' Time to File Forfeiture Complaint and To Toll the Civil Filing Deadline (ECF No. 4) extended the deadline to **December 16, 2024**.

6. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend the 90-day deadline set forth in 18 U.S.C. § 983(a)(3)(A) and (B), and to toll the deadline, in order for the parties to have a reasonable and sufficient period in which to evaluate their respective interests in and positions regarding the Property.

7. Claimants knowingly, intelligently, and voluntarily give up any rights they may have under 18 U.S.C. § 983(a)(3)(A) and (B) to require the United States to file a complaint for forfeiture against the Property, to return the Property, and/or to include the Property for forfeiture in a criminal action by **December 16, 2024**.

8. The parties agree that the deadline by which the United States shall be required to file a complaint for forfeiture against the Property, to return the Property, and/or to include the Property for forfeiture in a criminal action to toll the civil filing deadline shall be extended **91 days** from **December 16, 2024** to and including **March 17, 2025**.

9. Claimants waives all constitutional and statutory challenges related to the foregoing extension and give up any rights they may have to seek dismissal of any civil forfeiture complaint and/or any criminal forfeiture allegation in a criminal action on the ground that forfeiture proceedings were not timely commenced. Claimants further waives and agrees to the tolling of any rule or provision of law limiting the time for commencing, or providing notice of, forfeiture proceedings with respect to the Property, including, but not limited to, the limitations contained in 18 U.S.C. § 983 and 19 U.S.C. § 1621.

10. Claimants agree that until the United States files a complaint for forfeiture against the Property and/or alleges forfeiture of the Property in a criminal action, or until **March 17, 2025**, whichever occurs first, the Property shall remain in the custody of the United States and Claimants shall not seek its return for any reason in any manner.

11. By signing below, Jihan Williams declares that prior to signing this Stipulation, she provided a copy of it to Claimant Wilski, reviewed and consulted with Claimant Wilski regarding its contents, answered any questions Claimant Wilski had about it, determined that

Claimant Wilski understands its terms and are aware of their rights in this matter, and Claimant Wilski authorized Jihan Williams to sign this Stipulation.

12. By signing below, Vincent Haisha declares that prior to signing this Stipulation, he provided a copy of it to Claimant Rahaim, reviewed and consulted with Claimant Rahaim regarding its contents, answered any questions Claimant Rahiam had about it, determined that Claimant Rahaim understands its terms and are aware of their rights in this matter, and Claimant Rahiam authorized Vincent Haisha to sign this Stipulation.

13. By their signatures below, the Parties agree to all of the terms and conditions stated herein.

Approved as to form and substance:

Dawn N. Ison
United States Attorney

s/Catherine E. Morris
Catherine E. Morris (P84371)
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s/Jihan Williams (with consent)
Jihan Williams
Attorney for Claimant Wilski
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s/Vincent Haisha (with consent)

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Dated: December 10, 2024

UNITED STATES DISTRICT
COURT EASTERN DISTRICT OF
MICHIGAN SOUTHERN DIVISION

IN RE
Miscellaneous Jewelry
(Value \$7,896.00)
23-FBI-005911

Misc. No.: 23-mc-51742

**ORDER EXTENDING UNITED STATES' TIME TO FILE
FORFEITURE COMPLAINT AND TO TOLL THE CIVIL
FILING DEADLINE**

Pursuant to the parties' stipulation,

IT IS ORDERED that the deadline by which the United States shall be required to file a complaint for forfeiture against the Property, to return the Property, and/or to include the Property for forfeiture in a criminal action to toll the civil filing deadline shall be extended **91** days from **December 16, 2024** to and including **March 17, 2025**.

SO ORDERED.

Date: December 11, 2024

s/Jonathan J.C. Grey
JONATHAN J.C. GREY
UNITED STATES DISTRICT JUDGE

Certificate of Service

The undersigned certifies that the foregoing document was served upon counsel of record via the Court's ECF System to their respective email on the Notice of Electronic Filing on December 11, 2024.

s/ S. Osorio
Sandra Osorio
Case Manager